

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

-----	)
IN RE: NATIONAL	) MDL No. 2804
PRESCRIPTION OPIATE	)
LITIGATION	) Case No.
-----	) 1:17-MD-2804
	)
THIS DOCUMENT RELATES TO	) Hon. Dan A. Polster
ALL CASES	)
-----	)

HIGHLY CONFIDENTIAL  
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF  
DOUGLAS PETERSON

December 20, 2018

Chicago, Illinois

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**REDACTED**



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**REDACTED**

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1 conceptualizing phase?

2 A. I do both. I will guide and sometimes  
3 design for them or help.

4 Q. So, are you the one coming up with new  
5 plans or programs that need to be implemented or  
6 are you the one who gets tasked with actually  
7 making sure the plan gets put into place?

8 A. We are told they need a new program and  
9 I basically assign that to a person and try to get  
10 it implemented. Design it and then write the code  
11 to implement the programs that they ask for.

12 Q. So, somebody higher up than you --

13 A. Yes.

14 Q. -- tells you that they need a solution  
15 to an issue?

16 A. Yes.

17 Q. And then you help design and implement  
18 the solution?

19 A. Yes.

20 Q. You don't make the decision that we need  
21 a solution to some issue, whatever it is?

22 A. No.

23 Q. You receive an order from somebody  
24 higher up and you make sure it gets done?

Page 17

1 A. Yes.

2 Q. I got a little sidetracked. Remind me  
3 what you said, the first interaction you had with  
4 controlled substances in the early 2000s.

5 A. I helped build a system for us to  
6 warehouse and distribute to our stores controlled  
7 drug substances. C-II as we would refer to them  
8 as.

9 Q. Do you know how long Walgreens has been  
10 distributing C-IIs?

11 A. I don't believe they distribute any  
12 longer. They stopped sometime in I think late  
13 2000, but I don't remember exactly.

14 Q. Okay. If I said 2013, 2014, would that  
15 sound accurate to you?

16 A. It could be, yes.

17 Q. My question is a little bit different.  
18 Do you know when Walgreens began distributing  
19 controlled substances to their own stores?

20 A. That would have been sometime around the  
21 early 2000s.

22 Q. So, you assisted with implementing a  
23 process that assisted Walgreens with distributing  
24 controlled substances to their stores?

5 (Pages 14 to 17)

<p style="text-align: right;">Page 18</p> <p>1 A. Yes.</p> <p>2 Q. Generally describe what program you were</p> <p>3 asked to implement in the early 2000s.</p> <p>4 A. We were asked to implement an order and</p> <p>5 picking system as well as a system to print the</p> <p>6 C -- or the DEA 222 form via a printer instead of</p> <p>7 having to handwrite them, and then basically</p> <p>8 maintain the C 22 forms -- the DEA 222 forms, and</p> <p>9 then that's basically it.</p> <p>10 The stores would order. We process that</p> <p>11 order. We decide if we are in -- if we have the</p> <p>12 product in our DC or if it needs to be sent to a</p> <p>13 jobber, which is a distributor outside of us, and</p> <p>14 then we would split the order, pick the ones in our</p> <p>15 DC, send the forms for the other orders, ordered</p> <p>16 lines to the jobber --</p> <p>17 Q. Okay.</p> <p>18 A. -- to be picked.</p> <p>19 Q. I want to -- you used a couple terms</p> <p>20 there that I want to make sure that I understand.</p> <p>21 A. Sure.</p> <p>22 Q. First you said "jobber." Would it be</p> <p>23 fair to say that that is an outside vendor, such as</p> <p>24 Cardinal Health, AmerisourceBergen, McKesson, those</p>	<p style="text-align: right;">Page 20</p> <p>1 far as opening?</p> <p>2 A. Just setting up the environment, making</p> <p>3 sure all the programs are there, make sure they</p> <p>4 tested, make sure they work. That basically is it.</p> <p>5 They were already written, so...</p> <p>6 Q. What's the next thing you did?</p> <p>7 A. That would have been the Woodland</p> <p>8 distribution center.</p> <p>9 Q. Just setting it up, same thing?</p> <p>10 A. Same thing.</p> <p>11 Q. Okay. And those are the only three</p> <p>12 distribution centers Walgreens ever had that</p> <p>13 distributed C-IIs, correct?</p> <p>14 A. That I'm aware of, yes.</p> <p>15 Q. Okay. After you assisted getting these</p> <p>16 three distribution centers set up in what you</p> <p>17 believe is the early 2000s, what was the next thing</p> <p>18 you did related to controlled substances?</p> <p>19 A. Really nothing. Supported them. So, if</p> <p>20 something broke, I would fix it, help fix it or</p> <p>21 assign someone to fix it.</p> <p>22 Q. Are you aware of the concept that</p> <p>23 Walgreens has certain obligations related to</p> <p>24 controlled substances under federal statutes and</p>
<p style="text-align: right;">Page 19</p> <p>1 types of?</p> <p>2 A. Yes.</p> <p>3 Q. You keep using the term "DC." Do you</p> <p>4 mean distribution center?</p> <p>5 A. Sorry. Yes, distribution center.</p> <p>6 Q. Okay. At some point in time in the</p> <p>7 2000s were you involved in writing or implementing</p> <p>8 a program that would identify line item limits for</p> <p>9 orders of controlled substances?</p> <p>10 A. Line item limits, no.</p> <p>11 Q. What was the next project you worked on</p> <p>12 related to controlled substances after implementing</p> <p>13 a system to pick and ship controlled substances?</p> <p>14 A. Would have been opening of the next --</p> <p>15 our next DC.</p> <p>16 Q. What was the first DC that opened?</p> <p>17 A. Orlando.</p> <p>18 Q. What was the second one?</p> <p>19 A. Perrysburg.</p> <p>20 Q. And these are DCs meant for</p> <p>21 Schedule IIs, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Briefly what did you have to do as it</p> <p>24 relates to the Perrysburg distribution center as</p>	<p style="text-align: right;">Page 21</p> <p>1 federal regulations?</p> <p>2 A. No, I am not.</p> <p>3 Q. Are you aware of the concept of</p> <p>4 reporting suspicious orders of controlled</p> <p>5 substances?</p> <p>6 A. No.</p> <p>7 Q. Have you had any involvement in your</p> <p>8 time with supply chain logistics related to</p> <p>9 implementing thresholds or excessive query reports?</p> <p>10 A. We have an excessive order query that</p> <p>11 was written for all of our distribution centers</p> <p>12 that would look at orders before we processed them</p> <p>13 through our system.</p> <p>14 Q. Okay. And were you involved with</p> <p>15 writing that excessive order query?</p> <p>16 A. I was -- I believe I was involved or I</p> <p>17 was leading someone to actually write it.</p> <p>18 Q. Okay. And when did that process happen?</p> <p>19 A. That would have been in early 1990s when</p> <p>20 we went to our new distributions -- our warehouse</p> <p>21 management system. Sorry.</p> <p>22 Q. Okay. I want to make sure we got our</p> <p>23 dates right.</p> <p>24 So, you think in the early 1990s is when</p>

<p style="text-align: right;">Page 22</p> <p>1 you wrote the -- what would you call it? Is it an  2 excessive quantity query, excessive order query?  3 A. Excessive order query.  4 Q. And you've told me a couple times that  5 you believe the C-II distribution from Walgreens  6 began in the early 2000s, correct?  7 A. I believe so, yes.  8 Q. But this excessive order query was  9 written you believe in the early '90s?  10 A. Yes.  11 Q. And what involvement did you have in  12 writing the excessive order query?  13 A. I probably led the -- I'm trying to  14 remember exactly, but I know I led my team or a  15 team member in how to write it and get it created.  16 Q. Do you remember who else you worked with  17 on that?  18 A. I don't. I'm sorry. No.  19 Q. Okay. What was the purpose of  20 implementing an excessive order query?  21 A. The purpose of it is to try and catch  22 invalid -- product that was entered in excess of  23 what should normally be a normal value.  24 Q. Would it be fair to characterize it as</p>	<p style="text-align: right;">Page 24</p> <p>1 significant period of time before Walgreens began  2 distributing any controlled substances?  3 A. Yes, it was.  4 Q. Anything change about the excessive  5 order query when Walgreens began distributing  6 controlled substances?  7 A. No.  8 Q. Any amendments or modifications made to  9 the excessive order query?  10 A. We had to put their distribution center  11 number into the query so it would only look at its  12 orders and not pick up anything else.  13 Q. But you didn't have to change the  14 formula?  15 A. Nope, no.  16 Q. There weren't any other factors or  17 criteria that were considered in tweaking the  18 formula for controlled substances?  19 A. No.  20 Q. What was the criteria that was utilized  21 to generate the excessive order query?  22 A. It -- it looked at the order quantity  23 and if it was larger than a -- if it was greater  24 than a value that the distribution center entered</p>
<p style="text-align: right;">Page 23</p> <p>1 an inventory management type system?  2 A. It's not really a management system. It  3 just looked at orders that came in from a store,  4 checked against a value and if it was larger than  5 that, put it on a report.  6 Q. Why did you want to see orders that  7 might be larger than a certain value?  8 A. Because if product is not really wanted  9 and it was a mistake, then there was a lot of  10 excessive work that needed to be done both from the  11 distribution center and the store. So, if it could  12 be prevented upfront, it would save trouble for  13 all.  14 Q. So, the excessive order query was  15 implemented to catch mistakes that were coming in  16 from the Walgreens stores?  17 A. Yes, on orders, yes, quantities.  18 Q. Walgreens didn't want to have a  19 situation where they had an order come in with an  20 extra zero on it where they shipped the product to  21 the store and then had to go through the hassle of  22 getting it back?  23 A. Yes.  24 Q. And that process was in place for a</p>	<p style="text-align: right;">Page 25</p> <p>1 into the query, it would report it, that particular  2 product on the report.  3 Q. Was there any algorithm involved in that  4 excessive order query?  5 A. No.  6 Q. Was there any calculation involved in  7 establishing that excessive order query?  8 A. No.  9 Q. Was that excessive order query built  10 solely around a number that somebody at the  11 distribution center would type in for a particular  12 product?  13 A. Yes. And it's not product. It's for  14 the entire order, store order.  15 Q. Okay. Thank you for that clarification.  16 Help me understand that a little bit.  17 Would it be -- obviously a particular pharmacy  18 might order Claritin, an allergy medication. Is  19 the line item query written specifically for  20 Claritin or is it written for all orders of all  21 cold medications or allergy medications coming from  22 a particular store?  23 MR. LEVINE: Objection to form. You can  24 answer if you understand.</p>

<p style="text-align: right;">Page 26</p> <p>1 BY THE WITNESS:</p> <p>2 A. It's for all items carried in the</p> <p>3 warehouse, in the Walgreens stores.</p> <p>4 BY MR. GADDY:</p> <p>5 Q. But is it line by line? Is it product</p> <p>6 by product that is the -- why don't you explain for</p> <p>7 me what you meant when you told me that it's for</p> <p>8 the entire store as opposed to by product?</p> <p>9 A. Well, the store can order any product.</p> <p>10 I mean, we distribute products for most of the</p> <p>11 items in our Walgreens store. So, any ordered item</p> <p>12 it would look at irregardless of what type of item</p> <p>13 it is. It could be paper towels. It could be</p> <p>14 toilet paper, shampoo. It will look at any item we</p> <p>15 have and if it is greater than the value specified,</p> <p>16 it will appear on the report.</p> <p>17 Q. So, the distribution center enters in a</p> <p>18 quantity or a number for paper towels, correct?</p> <p>19 A. No, they're entering a number just --</p> <p>20 it's not item-specific. It's just a number and if</p> <p>21 it's greater than that number, it will display on a</p> <p>22 report. So, it's not product-specific.</p> <p>23 Q. Okay. So, it's one number that's</p> <p>24 entered for all products within the store?</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Is there any approval process that</p> <p>2 you're aware of for that person to raise or lower</p> <p>3 that number?</p> <p>4 A. Not that I am aware of.</p> <p>5 Q. In the 2000s when Walgreens began</p> <p>6 distributing controlled substances to its own</p> <p>7 stores, from your understanding, is the excessive</p> <p>8 order query just as you've been describing it thus</p> <p>9 far?</p> <p>10 A. Yes.</p> <p>11 Q. Are you aware of any special practices</p> <p>12 or procedures or approvals required regarding the</p> <p>13 excessive order query as it related to controlled</p> <p>14 substances in the 2000s?</p> <p>15 A. No, I am not.</p> <p>16 Q. And you were the person that helped</p> <p>17 implement this program, correct?</p> <p>18 A. That is correct.</p> <p>19 Q. Were you ever asked to make any changes</p> <p>20 or amendments to the program over the life of it?</p> <p>21 A. Not that I remember.</p> <p>22 Q. How often would that excessive query</p> <p>23 report be run?</p> <p>24 A. It's really up to the DCs to determine</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. One number whether it's paper towels,</p> <p>3 whether it's toilet paper, whether it's Claritin,</p> <p>4 or whether it's OxyContin?</p> <p>5 A. Yes.</p> <p>6 Q. And that number is chosen by an</p> <p>7 individual at the distribution center?</p> <p>8 A. Yes. It's chosen by someone at the</p> <p>9 distribution center.</p> <p>10 Q. Do you know the position of the person</p> <p>11 at the distribution center that makes that</p> <p>12 determination?</p> <p>13 A. No, I do not.</p> <p>14 Q. Have you heard the position of SAIL</p> <p>15 coordinator, S-A-I-L coordinator?</p> <p>16 A. Yes. I know SAIL coordinator.</p> <p>17 Q. Do you know whether or not the SAIL</p> <p>18 coordinator is the person that makes the decision</p> <p>19 that a certain number is going to be entered as the</p> <p>20 criteria?</p> <p>21 A. I can't say for sure.</p> <p>22 Q. Regardless of who it is, that person has</p> <p>23 discretion to raise or lower that number, correct?</p> <p>24 A. That is correct.</p>	<p style="text-align: right;">Page 29</p> <p>1 that. It could be daily. It could be -- it's up</p> <p>2 to their decision to how many times they would or</p> <p>3 when they would run it.</p> <p>4 Q. From your understanding, do orders come</p> <p>5 into the distribution center from -- from stores</p> <p>6 pretty much on a daily basis?</p> <p>7 A. Yes.</p> <p>8 Q. It would make sense to run the report</p> <p>9 daily?</p> <p>10 Let me ask it this way: If your goal is</p> <p>11 to catch orders that might have been entered in</p> <p>12 error, which I think is what you told us the</p> <p>13 intention of the report was, it would make sense to</p> <p>14 run it daily so that you don't ship any product</p> <p>15 that wasn't intended to be shipped?</p> <p>16 A. Yes.</p> <p>17 Q. Are you aware of any policy or procedure</p> <p>18 for what is supposed to be done if there are</p> <p>19 certain orders that populate on that excessive</p> <p>20 order query?</p> <p>21 MR. LEVINE: Objection; lacks foundation.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I'm not -- I'm not sure. I don't know</p> <p>24 of any policies personally, no.</p>



<p style="text-align: right;">Page 30</p> <p>1 BY MR. GADDY:</p> <p>2 Q. Were you asked to implement or design</p> <p>3 any policies or procedures as far as what</p> <p>4 individuals or what anybody was supposed to do if</p> <p>5 any orders populated on that query?</p> <p>6 A. No. I would just -- I just wrote the</p> <p>7 program -- actually the query that created the</p> <p>8 data. I wasn't involved in policies.</p> <p>9 Q. Okay. You don't work in the</p> <p>10 distribution center, correct?</p> <p>11 A. I do not work in the distribution</p> <p>12 center, no.</p> <p>13 Q. Have you ever worked in a distribution</p> <p>14 center?</p> <p>15 A. No, I have not.</p> <p>16 Q. Have you visited distribution centers?</p> <p>17 A. Yes.</p> <p>18 Q. Have you ever been to a distribution</p> <p>19 center and watched the process of them running this</p> <p>20 excessive order query?</p> <p>21 A. Not that query in particular, no.</p> <p>22 Q. That process of the excessive order</p> <p>23 query, as far as you know, does that still happen</p> <p>24 today?</p>	<p style="text-align: right;">Page 32</p> <p>1 excessive orders?</p> <p>2 A. Can you repeat that? I'm sorry.</p> <p>3 Q. Sure. I think you told us that the</p> <p>4 excessive order query would populate a report for</p> <p>5 any items that were ordered in excess of whatever a</p> <p>6 line limit was, is that accurate?</p> <p>7 A. Yes.</p> <p>8 Q. And I think you told us that that line</p> <p>9 limit is inputted by somebody at the distribution</p> <p>10 center?</p> <p>11 A. That is correct.</p> <p>12 Q. Was there any recommended or suggested</p> <p>13 value for what that line limit should be that</p> <p>14 you're aware of?</p> <p>15 A. Not that I'm aware of, no.</p> <p>16 Q. Did the report that you wrote, that you</p> <p>17 implemented that you wrote the code for, did it</p> <p>18 suggest or recommend any particular line limit?</p> <p>19 A. No. That was up to the DC to make that</p> <p>20 determination. Distribution center. Sorry.</p> <p>21 Q. Sure. You can say "DC." I just wanted</p> <p>22 to make sure we were clear on what you were talking</p> <p>23 about.</p> <p>24 Were the -- were the line limits that</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. As far as you're aware, have there been</p> <p>3 any changes or amendments to that -- to that</p> <p>4 process, the excessive order query?</p> <p>5 MR. LEVINE: Objection; foundation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I don't know of any, no.</p> <p>8 BY MR. GADDY:</p> <p>9 Q. Have you or your team within supply and</p> <p>10 logistics been asked to make any changes or</p> <p>11 amendments to the excessive order query?</p> <p>12 A. No.</p> <p>13 Q. At any point in time was you or your</p> <p>14 team or anybody else that you're aware of in supply</p> <p>15 and logistics asked to make any changes or</p> <p>16 amendments to the excessive order query as it</p> <p>17 related to running that report for controlled</p> <p>18 substances?</p> <p>19 A. No.</p> <p>20 Q. Did the excessive order query report ask</p> <p>21 or -- excuse me. Strike that.</p> <p>22 Did the excessive order query report</p> <p>23 suggest or recommend any particular line limit or</p> <p>24 threshold that would be used to trigger any</p>	<p style="text-align: right;">Page 33</p> <p>1 were implemented at distribution centers, do you</p> <p>2 know whether or not they were static, the same</p> <p>3 across all distribution centers, or do you not know</p> <p>4 that?</p> <p>5 A. I do not know that.</p> <p>6 Q. Are you aware of any policies or</p> <p>7 procedures about setting the line limits for</p> <p>8 stores?</p> <p>9 A. No, I am not aware of any.</p> <p>10 Q. And, again, whatever line limit is set</p> <p>11 would be the same for paper towels, for cold</p> <p>12 medication and for controlled substances, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Outside of writing the code and</p> <p>15 implementing the excessive order query, during your</p> <p>16 time at Walgreens have you been involved in any</p> <p>17 other projects related to thresholds or ceilings as</p> <p>18 it relates to controlled substances?</p> <p>19 A. No.</p> <p>20 Q. During your time at Walgreens have</p> <p>21 you -- in supply and logistics have you been</p> <p>22 involved in any projects that involve ARCOS</p> <p>23 reporting?</p> <p>24 A. The system that we run at the DCs</p>

<p style="text-align: right;">Page 34</p> <p>1 created a file that fed ARCOS, but that's as far as</p> <p>2 my limitations went.</p> <p>3 Q. Tell me what you mean by that.</p> <p>4 A. As we ship out our product to the</p> <p>5 stores, there is a -- the data is written to a file</p> <p>6 that will feed into the ARCOS system, and we</p> <p>7 created that file; but after that, I had no</p> <p>8 involvement with the ARCOS system itself.</p> <p>9 Q. Okay. Have you in your time at</p> <p>10 Walgreens in supply chain and logistics had any</p> <p>11 involvement with reporting of any controlled</p> <p>12 substance information to the DEA?</p> <p>13 A. No.</p> <p>14 Q. During your time in supply and logistics</p> <p>15 at Walgreens, have you had any involvement in</p> <p>16 generating suspicious order reports?</p> <p>17 A. No.</p> <p>18 Q. Have you had any involvement in your</p> <p>19 time with the supply chain and logistics at</p> <p>20 Walgreens with any type of due diligence reports as</p> <p>21 it relates to controlled substances?</p> <p>22 A. No.</p> <p>23 Q. During your time at Walgreens did you</p> <p>24 become aware that the controlled substance</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. And specifically you were asked what, to</p> <p>2 prevent controlled substances from going to stores</p> <p>3 that are typically serviced by the Jupiter</p> <p>4 distribution center?</p> <p>5 A. We were asked to, if I -- I don't</p> <p>6 remember exactly. But I believe it was to redirect</p> <p>7 the orders to a different distribution center other</p> <p>8 than Jupiter.</p> <p>9 Q. There were only three Walgreens</p> <p>10 distribution centers that distributed controlled</p> <p>11 substances, correct?</p> <p>12 A. That is correct, to my knowledge.</p> <p>13 Q. And that's Jupiter in Florida, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Perrysburg in Ohio?</p> <p>16 A. Yes.</p> <p>17 Q. And Woodland in California?</p> <p>18 A. Yes.</p> <p>19 Q. When you were first asked by your</p> <p>20 supervisor to or -- excuse me -- first informed by</p> <p>21 your supervisor that you needed to have the orders</p> <p>22 for stores that are typically serviced by Jupiter</p> <p>23 diverted elsewhere, were they diverted to another</p> <p>24 Walgreens distribution center or were they diverted</p>
<p style="text-align: right;">Page 35</p> <p>1 distribution center in Jupiter, Florida was</p> <p>2 investigated by the DEA?</p> <p>3 A. I became aware of it when they asked us</p> <p>4 to stop sending orders through it.</p> <p>5 Q. Tell me how you became aware that the</p> <p>6 Jupiter distribution center was under investigation</p> <p>7 by the DEA.</p> <p>8 A. I believe my boss at the time said we</p> <p>9 need to look at ways to prevent orders from going</p> <p>10 to -- to the Jupiter DC.</p> <p>11 Q. Okay.</p> <p>12 A. From a programmer point of view.</p> <p>13 Q. So, there is a -- would it be fair to</p> <p>14 say there is an electronic system by which the</p> <p>15 stores order product, including controlled</p> <p>16 substances, from distribution centers?</p> <p>17 A. Yes, there is.</p> <p>18 Q. How long has that been an electronic</p> <p>19 process?</p> <p>20 A. Since the early 1990s.</p> <p>21 Q. And also in the early 1990s is when</p> <p>22 Walgreens began running these excessive order</p> <p>23 queries?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 37</p> <p>1 to a jobber?</p> <p>2 A. I'm trying -- that was a long time ago.</p> <p>3 But probably to both I would guess, but I don't</p> <p>4 remember exactly. Sorry.</p> <p>5 Q. Do you know why the orders that</p> <p>6 typically were serviced by the Jupiter distribution</p> <p>7 center for controlled substances needed to be</p> <p>8 outsourced to either other Walgreens C-II</p> <p>9 distribution centers or to jobbers?</p> <p>10 A. Not exactly except I was asked to do it.</p> <p>11 Q. Were you given any high level</p> <p>12 presentation about why the DEA was involved in</p> <p>13 Jupiter?</p> <p>14 A. No.</p> <p>15 Q. Were you given any explanation from</p> <p>16 anybody higher than you at Walgreens about what was</p> <p>17 going on as it related to the DEA and controlled</p> <p>18 substances at the Jupiter distribution center?</p> <p>19 A. Not that I remember, no.</p> <p>20 Q. Were you aware that at some point in</p> <p>21 time Walgreens and the DEA actually entered into a</p> <p>22 settlement regarding the allegations stemming from</p> <p>23 the Jupiter distribution center as it related to</p> <p>24 controlled substances?</p>

**REDACTED**

1 A. No, I do not.

2 Q. Did anybody at Walgreens ever give you  
3 any information about any litigation or settlement  
4 between the DEA and Walgreens relating to -- to  
5 that DEA investigation of the Jupiter distribution  
6 center?

7 A. No.

8 Q. Let me show you what we're going to mark  
9 as -- I'm going to show you P-WAG-1, which we're  
10 going to mark as Peterson 1.

11 (WHEREUPON, a certain document was  
12 marked as Walgreens-Peterson  
13 Exhibit No. 1: Binder, "Settlement  
14 and Memorandum of Agreement";  
15 WAGMDL00490963 - 00490978 with  
16 attachments.)

17 BY MR. GADDY:

18 Q. Mr. Peterson, you can flip open that  
19 page. Do you see the top of the first page -- if  
20 you look, I'm going to use -- at the bottom  
21 right-hand corner there is page numbers and you  
22 should be on page 1 out of 343.

23 Do you see that?

24 A. Yeah. 1 out of 13 you mean?

**REDACTED**

**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**





**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**





**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



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**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**





**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



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1 your team does from time to time?

2 A. We investigate issues, yes.

3 Q. You say that "I was asked by John

4 Merritello if our current system would adjust C-II

5 jobber orders if there was a line limit on an item.

6 Because Jupiter is sending everything to the

7 jobbers, I took a quick look at Jupiter and noticed

8 that were line limit insufficient codes on working

9 order scan. Therefore, I assume we were sending

10 line limit insufficients to the stores. But the

11 e-mail below suggested that I assume incorrectly."

12 Do you see that?

13 A. Yes, I do.

14 Q. Does that make sense to you?

15 A. Yes.

16 Q. Okay. Can you explain it to me? I

17 don't completely follow.

18 A. It looks like our programs were working

19 as they were supposed to and we were -- were

20 creating insufficients, but it also looks like we

21 were still sending the order quantity on.

22 Q. Okay. Even if it was being ordered in

23 excess of the line limit?

24 A. Yes.

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1 Q. Do you know how long that was happening

2 for?

3 A. No, I do not remember.

4 Q. Okay. You say, "I then looked at the

5 jobber history file and saw that the insufficient

6 code for the item below was 10 (no regular

7 quantity). This suggests to me that once OP" --

8 what's OP?

9 A. Order processing. That's a system that

10 we run our orders through.

11 Q. "This suggests to me that once order

12 processing determines that an item is insufficient

13 for no regular quantity that it does not check any

14 other insufficients (which is what I would expect).

15 Is it possible that you or somebody else on your

16 team could verify this? Any help would be

17 appreciated."

18 Do you see that?

19 A. Yes, I do.

20 Q. So, for some period of time we

21 understand from this issue that you had to -- that

22 you were asked to look into and investigate by John

23 Merritello that there was an issue within the order

24 processing system for C-IIs being ordered out of

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1 Jupiter that were allowing the stores to order

2 product in excess of the line limit?

3 A. It's saying there is possibly an issue,

4 but does not identify if there is or not. That's

5 why I was asking help from someone else.

6 Q. Okay. Well, you were sent a spreadsheet

7 that had several examples of several stores that

8 had been permitted to order C-IIs over their line

9 limit, correct?

10 A. That spreadsheet that's attached to here

11 showed that, yes.

12 Q. And, so, it looks like that was an issue

13 as it related to orders coming through the Jupiter

14 distribution center and you were asking somebody to

15 try to look into that and try to help you out?

16 A. Yes.

17 Q. Do you remember whether or not you were

18 able to solve that issue?

19 A. No, I do not remember.

20 Q. Do you know whether or not the order

21 processing system was ever remedied to prevent

22 stores from ordering controlled substances above

23 their line limit?

24 A. I don't remember a change like that, no.

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1 Q. Is it possible that you weren't able to

2 fix that problem?

3 A. Anything is possible, but I believe we

4 would have fixed it.

5 Q. Do you know how long it would have taken

6 you?

7 A. I don't remember.

8 Q. Do you know how long stores were able to

9 order controlled substances above their line limits

10 before this problem was brought to your attention?

11 A. No, I do not remember.

12 Q. I will show you what I will mark as

13 Peterson No. 28. It's two pages, but I'm pretty

14 sure it's the same document twice in a row.

15 (WHEREUPON, a certain document was

16 marked as Walgreens-Peterson

17 Exhibit No. 28: Document,

18 "Handling Suspicious Drug Orders";

19 WAGFLDEA00001584 - 00001855.)

20 BY MR. GADDY:

21 Q. Do you recognize this document?

22 A. No, I do not recognize this.

23 Q. Do you know if you've ever seen this

24 before?



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1 A. To the best of my knowledge, I've never  
2 seen this before.

3 Q. Okay. I'm just going to ask you a  
4 couple questions about it.

5 Do you see below the text there it says  
6 that -- the last thing written is that this policy  
7 originated 9/8/98, and then right above it it says  
8 it was revised 2/15/05?

9 A. Yes, I see that.

10 Q. If we go down to the bottom of the page,  
11 do you see an address that looks like this document  
12 came from the Walgreens intranet?

13 A. Yes, I would call that the Walgreen  
14 Internet.

15 Q. Okay.

16 A. Intranet I mean.

17 Q. Sure. And are you familiar with the  
18 concept that Walgreens at least at some places in  
19 some times maintained some types of policies or  
20 procedures on that intranet that its employees  
21 could access?

22 A. I understand that the distribution  
23 centers write their own SOPs. I don't normally --  
24 I never look at them. But yes.

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1 Q. The reason I wanted to ask you about  
2 this one is because it references Logistics and  
3 Planning Department. So let me just read this to  
4 you and then ask if this is anything that you were  
5 involved with.

6 It says, "The Logistics and Planning  
7 Department sends the Suspicious Control Drug Orders  
8 report to all distribution centers."

9 Do you see that?

10 A. Yes, I do.

11 Q. Okay. It says -- let me pause there and  
12 ask you a couple questions about that.

13 The Logistics and Planning Department.  
14 Do you know what that is?

15 A. I'm sorry. Go back up one second. Mine  
16 is a little different than your document.

17 Q. Okay. That's not good.

18 A. I mean, I don't -- I read it here, but I  
19 don't see it on my document unless I'm misplacing  
20 it.

21 MR. LEVINE: It looks like the pages of what  
22 you handed to me are different than the pages that  
23 the witness has.

24 THE WITNESS: Yes.

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1 MR. LEVINE: In other words, they are both two  
2 pages but the order is switched.

3 MR. GADDY: Okay. Mark, let me give this to  
4 you first. Does that look like what you have?

5 MR. LEVINE: That's the first page of what I  
6 got.

7 MR. GADDY: Okay.

8 BY MR. GADDY:

9 Q. I'm only going to -- I'm only going to  
10 show you the first page. Okay? I think you got  
11 the right one now.

12 A. Yes.

13 Q. Okay. All right. Thanks for pointing  
14 that out, Mr. Peterson. All right. Let's start  
15 over.

16 You have Peterson 28 in front of you?

17 A. Yes, I do.

18 Q. Okay. And, again, if you look at the  
19 bottom of the page, do you see the indication of  
20 the Walgreens intranet?

21 A. Yes, I do.

22 Q. Okay. And if you go back up to the top,  
23 is the name of the document "Handling Suspicious  
24 Drug Orders"?

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1 A. Yes.

2 Q. And same, the dates look to be the same  
3 as I read earlier, "Originated 9/8/98. Revised  
4 2/15/05." Is that correct?

5 A. Yes, it is.

6 Q. Okay. And let's try again with the body  
7 of the document. It says, "The Logistics and  
8 Planning Department sends the Suspicious Control  
9 Drug Orders report to all distribution centers."

10 Do you see that?

11 A. Yes, I do.

12 Q. Are you aware of what the Logistics and  
13 Planning Department is?

14 A. No, I don't. I mean -- let me. Sorry.  
15 I know what Logistics and Planning Department is,  
16 yes.

17 Q. Okay.

18 A. Within Walgreens.

19 Q. Is that -- you're supply and logistics.  
20 Is that the same as or different than this?

21 A. It would be different than that.

22 Q. Okay. What is the Logistics and  
23 Planning Department?

24 A. Well, it's another division within

<p style="text-align: right;">Page 258</p> <p>1 logistics that does more probably the planning --</p> <p>2 Q. Are they --</p> <p>3 A. -- area.</p> <p>4 Q. -- IT folks or?</p> <p>5 A. I'm -- from this e-mail, we don't have</p> <p>6 an IT department that I know of that's called that.</p> <p>7 So, it looks like it's a business area.</p> <p>8 Q. Are you able to give me like a</p> <p>9 30,000-foot view of what the Logistics and Planning</p> <p>10 Department does?</p> <p>11 A. No, I couldn't.</p> <p>12 Q. Okay.</p> <p>13 A. Off the top of my head, no.</p> <p>14 Q. Okay. It says that that particular</p> <p>15 department sends the control -- the Suspicious</p> <p>16 Control Drug Orders report to all distribution</p> <p>17 centers.</p> <p>18 Do you see that?</p> <p>19 A. Yes, I see that.</p> <p>20 Q. Do you know what a Suspicious Control</p> <p>21 Drug Order report is?</p> <p>22 A. No, I do not.</p> <p>23 Q. Have you ever heard of that phrase</p> <p>24 before?</p>	<p style="text-align: right;">Page 260</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. It says, "Distribution centers must file</p> <p>4 all Suspicious Control Drug Order reports for five</p> <p>5 years."</p> <p>6 You've already told us you don't know</p> <p>7 what that means, right?</p> <p>8 A. True.</p> <p>9 Q. It goes on to say, "Effective calendar</p> <p>10 year 2012, the Controlled Substance Order</p> <p>11 Monitoring and Prevention System."</p> <p>12 Let me stop right there.</p> <p>13 Do you know what that is?</p> <p>14 A. No, I do not.</p> <p>15 Q. It says that particular system,</p> <p>16 "prevents suspicious control drugs from being</p> <p>17 shipped to the store. In calendar year 2012,</p> <p>18 because of the program mentioned, suspicious</p> <p>19 control drug reports are no longer generated as</p> <p>20 their shipment is prevented by the system."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Now, Mr. Peterson, when I read that, it</p> <p>24 occurred to me that it sounded like that was</p>
<p style="text-align: right;">Page 259</p> <p>1 A. No.</p> <p>2 Q. Okay. I'm going to show you what I'm</p> <p>3 going to mark as Peterson 29.</p> <p>4 (WHEREUPON, a certain document was</p> <p>5 marked as Walgreens-Peterson</p> <p>6 Exhibit No. 29: Document,</p> <p>7 "Handling Suspicious Orders and</p> <p>8 Loss of Controlled Drugs";</p> <p>9 WAGFLDEA00000028.)</p> <p>10 BY MR. GADDY:</p> <p>11 Q. And this should be a one-page document,</p> <p>12 right?</p> <p>13 A. Yes, it is.</p> <p>14 Q. And we should see the Walgreens intranet</p> <p>15 down at the bottom of the page again?</p> <p>16 A. Yes.</p> <p>17 Q. And, again, looking at the chronology of</p> <p>18 this particular policy, do you see that it</p> <p>19 originated in '98, revised in 2005 and revised</p> <p>20 again in April of 2012?</p> <p>21 A. Yes.</p> <p>22 Q. And the policy here is or the title is</p> <p>23 "Handling Suspicious Orders and Loss of Controlled</p> <p>24 Drugs."</p>	<p style="text-align: right;">Page 261</p> <p>1 something that was probably designed or implemented</p> <p>2 by an IT department.</p> <p>3 So, my question for you is, based on</p> <p>4 what we just read, does that sound familiar to you</p> <p>5 as any type of program or protocol or solution that</p> <p>6 you or your team was ever asked to implement during</p> <p>7 your time at Walgreens?</p> <p>8 A. No, it is nothing I'm familiar with.</p> <p>9 Q. Okay. Is that anything that you've ever</p> <p>10 heard of, even if it's not you or your team, any of</p> <p>11 the other IT teams at Walgreens being involved in</p> <p>12 as far as designing a system that would prevent</p> <p>13 suspicious control drugs reports from being</p> <p>14 generated?</p> <p>15 A. No, I'm -- no, I'm not. I do not know.</p> <p>16 Q. When you had the opportunity to talk</p> <p>17 with Mr. Bratton, did any of your conversations</p> <p>18 revolve around suspicious order -- or excuse me --</p> <p>19 Suspicious Control Drug Order reports?</p> <p>20 A. No.</p> <p>21 Q. In any of your conversations with</p> <p>22 Mr. Bratton, did you tell him that the excessive</p> <p>23 order queries were designed to detect suspicious</p> <p>24 orders of controlled substances?</p>

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1 A. No, I did not.  
 2 Q. And you agree that the suspicious order  
 3 query -- excuse me -- the excessive order queries  
 4 was not designed by you to be a tool required by  
 5 the Controlled Substance Act to monitor or detect  
 6 for suspicious orders of controlled substances?  
 7 A. No, it was not.  
 8 Q. I will show you what I'll mark as  
 9 Peterson 30.  
 10 (WHEREUPON, a certain document was  
 11 marked as Walgreens-Peterson  
 12 Exhibit No. 30: 2/11/11 e-mail  
 13 string; WAGFLDEA00000891 -  
 14 00000901.)  
 15 BY MR. GADDY:  
 16 Q. Again, the format is a little funky  
 17 here. This is going to be P-WAG-1016.  
 18 The format is a little funky here, but  
 19 you recognize this to be another e-mail chain?  
 20 A. Yes, it looks that way, yes.  
 21 Q. Okay. And if you flip to the Bates  
 22 number ending in 900.  
 23 A. Yes.  
 24 Q. And you see that this is an e-mail

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1 starting on the top left-hand corner of the  
 2 page from Victoria Lau and it looks like it's to  
 3 Kristine Atwell.  
 4 Do you see that?  
 5 A. Yes, I do.  
 6 Q. And do you know who either of those  
 7 individuals are?  
 8 A. No. I do not.  
 9 Q. And the subject of this e-mail is  
 10 "Oxycodone 30 milligram tab"?  
 11 A. Yes.  
 12 Q. At this point in time, in February of  
 13 2011, the excessive order query that you designed  
 14 back in the early '90s was -- was operational and  
 15 in effect, correct?  
 16 A. As far as I know, yes.  
 17 Q. The e-mail from Victoria says,  
 18 "Kristine, I know you're out of WIC 682971 again."  
 19 Do you see that?  
 20 A. Yes.  
 21 Q. And just so we can make sure we know  
 22 what that is, if you look up in the subject of the  
 23 e-mail, do you see that same number indicating the  
 24 hydrocodone?

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1 A. Yes, I do.  
 2 Q. "I know you are out of hydrocodone" --  
 3 excuse me. Did I say hydrocodone? I meant  
 4 oxycodone.  
 5 A. Okay.  
 6 Q. It says, "I know you are out of  
 7 oxycodone again. The vendor was able to secure  
 8 some more supply and will be overnighting 5,136  
 9 tomorrow and shipping 31,680 ground. I know it  
 10 won't last you that long but it's the most I could  
 11 obtain at this time."  
 12 Do you see that?  
 13 A. Yes, I do.  
 14 Q. And if you flip the page, do you see the  
 15 signature block for Victoria Lau and it indicates  
 16 that she's a replenishment buyer?  
 17 A. Yes, it does.  
 18 Q. Are you familiar with that position at  
 19 Walgreens?  
 20 A. I'm familiar with buyers, yes.  
 21 Q. Generally speaking, what would her role  
 22 be?  
 23 A. To replenish. They buy product for  
 24 our...

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1 Q. So, as it relates to this particular  
 2 e-mail, it's talking about a particular store or  
 3 stores needing oxycodone, Victoria would be in  
 4 charge of buying the oxycodone from, I guess, the  
 5 manufacturers that would sell it. Is that your  
 6 understanding?  
 7 A. I'm not 100% sure about her herself, but  
 8 based on the e-mails, it looks like she's helping  
 9 to procure some medicine.  
 10 Q. And that's your general understanding of  
 11 what the buyers do?  
 12 A. Basically, yes.  
 13 Q. Okay. If you turn up a page or two,  
 14 we'll start at 898.  
 15 A. Okay.  
 16 Q. And it looks like Kristine responds to  
 17 Victoria. Do you see that? It's starting in the  
 18 middle of the page.  
 19 A. Yes, I do.  
 20 Q. Okay. And then if you flip to the next  
 21 page, we're still in the same subject line, the  
 22 "Oxycodone 30 milligram tablets."  
 23 Do you see that?  
 24 A. Yes.

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1 Q. And it looks like Kristine says,  
2 "I received a small pallet today but they were  
3 oxycodone 15s and not 30s."  
4 Do you see that?  
5 A. Yes, I do.  
6 Q. Do you have a general understanding that  
7 many drugs, including oxycodone, can be different  
8 strengths?  
9 A. Yes, I know they can have different  
10 strengths.  
11 Q. For example, oxycodone can come in 15  
12 milligram pills or 30 milligram pills?  
13 A. Not familiar with that particular one  
14 but...  
15 Q. You see in the subject line she is  
16 talking specifically about hydrocodone 30 milligram  
17 pills?  
18 A. Yes.  
19 Q. And you have a general understanding  
20 that a 30 milligram pill would be a stronger pill  
21 than the 15 milligram pill?  
22 A. Would be a higher dosage?  
23 Q. Correct.  
24 A. Yes.

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1 Q. Kristine says, "I received a small  
2 pallet today but they were oxycodone 15s, not 30s.  
3 Can you confirm that the 30s were set to delivery  
4 today? Also, how long will we continue to struggle  
5 getting this product if the manufacturer is  
6 producing?"  
7 Do you see that?  
8 A. Yes, I see it.  
9 Q. If you flip the page, it looks like we  
10 see the response and she says, "Hi Kristine, I will  
11 follow up again with the vendor to see if I can  
12 obtain tracking. I did alert them that you were  
13 out of 30 and that is what they were supposed to  
14 overnight. I'll keep you posted on their  
15 response."  
16 Do you see that?  
17 A. Yes, I do.  
18 Q. She goes on to say, "The issue with this  
19 item is the usage keeps increasing."  
20 Do you see that?  
21 A. Yes.  
22 Q. "It's nearly doubled in usage in one  
23 year and the C-II manufacturers have quotas on what  
24 they can ship per the DEA."

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1 Do you see that?  
2 A. Yes.  
3 Q. "It has been confirmed" -- excuse me.  
4 "It hasn't been confirmed but I am  
5 hearing that this is mainly an issue in Florida and  
6 it pertains to the issues surrounding the pain  
7 clinics and dispensing."  
8 Do you see that?  
9 A. Yes, I see it.  
10 Q. In the February 2011 time frame when  
11 this particular e-mail traffic is happening within  
12 Walgreens, that excessive order query that you  
13 designed in the early '90s continued to be  
14 operational, correct?  
15 MR. LEVINE: Objection; asked and answered,  
16 form.  
17 BY THE WITNESS:  
18 A. To the best of my knowledge, yes.  
19 BY MR. GADDY:  
20 Q. Flip two pages for me, please, to 896.  
21 Are you with me?  
22 A. Yes, I am with you now.  
23 Q. And it looks like Kristine responds at  
24 the bottom of the page. She says, "You are exactly

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1 correct regarding the Florida pain clinics. I have  
2 stores that try to order 1,000 bottles per week. I  
3 have alerted their pharmacy supervisors, but they  
4 have all said that they require that much to fill  
5 scripts."  
6 Do you see that?  
7 A. Yes.  
8 Q. And we see there Kristine Atwell's  
9 signature block that she is the C-II function  
10 manager at Jupiter?  
11 A. Yes.  
12 Q. Do you have an understanding of the role  
13 of the C-II function manager?  
14 A. They manage the distribution center  
15 there. That's my understanding.  
16 Q. And specifically they would manage the  
17 controlled substances for the distribution center?  
18 A. With hers, yes. Hers is C-II.  
19 Q. Would your understanding be that -- we  
20 have talked about Deb Bish a little bit -- that she  
21 would have an equivalent position at the Perrysburg  
22 distribution center?  
23 A. Yes, I think so.  
24 Q. Okay. If you flip for me, please, to

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1 894. And it looks like we get Victoria's response  
2 to Kristine, and we see it at the bottom of the  
3 page.

4 And she says, "1000/ week per store?  
5 That is unbelievable. Well, I did hear back from  
6 the vendor and below was her response. I hope this  
7 helps you out."

8 And if we turn the page, we see a report  
9 from the vendor. It says, "Victoria, as promised,  
10 a total of 5,136 units of the Oxy 30 milligrams  
11 were shipped to Jupiter Florida yesterday for  
12 delivery today. UPS tracking shows this order on  
13 the truck for delivery. In addition to these 5,136  
14 units we also shipped a total of 31,680 units out  
15 yesterday via regular delivery. I am working on  
16 getting that tracking as we speak."

17 Do you see that?

18 A. Yes.

19 Q. So, it looks like Victoria was able to  
20 secure these approximately 36,000 additional  
21 oxycodone 30s for the Walgreens Jupiter  
22 distribution center, correct?

23 MR. LEVINE: Objection; lacks foundation.

24 BY THE WITNESS:

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1 A. I wouldn't know that myself.

2 BY MR. GADDY:

3 Q. Okay. Is that what Victoria has  
4 indicated in her e-mail there?

5 MR. LEVINE: Objection; lacks foundation.

6 BY THE WITNESS:

7 A. I don't really know.

8 BY MR. GADDY:

9 Q. Okay. I'm going to show you what I'm  
10 going to mark as Peterson 31.

11 (WHEREUPON, a certain document was  
12 marked as Walgreens-Peterson  
13 Exhibit No. 31: Document,  
14 "Threshold Violations-Monthly";  
15 WAGMDL00674619.)

16 BY MR. GADDY:

17 Q. Can you tell me what this report is?

18 A. No, I am not familiar with this report.

19 Q. Do you see up at the top center of the  
20 page that's underlined it says "Threshold  
21 Violations-Monthly"?

22 A. I see that, yes.

23 Q. You see to the right of that up top,  
24 it's got an order or -- excuse me -- a date of

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1 9/23/09?

2 A. Yes.

3 Q. And below that it says "Suspicious  
4 Order"?

5 A. Yes. I see that.

6 Q. Below "Suspicious Order" it has it looks  
7 like a month start and end date of 9/1 through  
8 9/30.

9 Do you see that?

10 A. Yes, I do.

11 Q. And then down below that, do we see  
12 several -- I guess let's start in the chart, start  
13 on the left-hand side, it looks like it has a  
14 district number and then a store number.

15 Do you see that?

16 A. Yes.

17 Q. And it looks like on this particular  
18 page it's the same store?

19 A. Yes.

20 Q. And then to the -- to the right of that  
21 we have a WIC number and then an item description.

22 Do you see that?

23 A. Yes, I do.

24 Q. And the column to the right of that

**REDACTED**

**REDACTED**



**REDACTED**



**REDACTED**





**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**





**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**





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**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**





**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**



**REDACTED**

